

Transcript - March 26 AmeriCorps Rulemaking Session

AMERICORPS RULEMAKING SESSION

MARCH 26, 2004

BOSTON, MASSACHUSETTS

- - -

David Eisner
CEO, Corporation for National and Community Service

Rosie Mauk
Director, AmeriCorps

Alan Solomont
Board Member, Corporation for National and Community Service

Gretchen Van der Veer
Director, Office of Leadership Development and Training

- - -

PROCEEDINGS

MR. EISNER: This is a letter addressed to me. It says, "Welcome to Boston. I'm writing to express my strong support for the open process you're beginning today in New England and to encourage broad participation and discussion as you proceed with your future meetings in Washington, D.C. and Dallas. We're all proud of the first ten years of the Corporation, and we have much more to learn from the talented men and women who created AmeriCorps, encouraged learn and serve, and championed senior service programs.

"Led by our strong state commissions and supported by national grants as well, we intend to do all we can with our neighboring New England states to encourage service activities in our communities, and we welcome your leadership as the rulemaking process begins.

"Some of our most successful programs in the state are widely known such as City Year, Jumpstart, and Generations, Incorporated. Others are known in the community they serve so well such as ROCA in Chelsea and Barnstable AmeriCorps. Each of our programs holds itself to high performance standards and can be models for other service programs across the country.

"We look forward very much to working with you and the Corporation in the years ahead to continue Massachusetts' tradition of service to others. With respect and appreciation. Sincerely, Edward Kennedy."

I forgot to note, unfortunately, I'm going to leave about a half an hour early, at I believe 12:30, for a personal engagement. My mother-in-law turns 65, and any of you who know her, you can't say that you know that, and we have a surprise party, and my wife has told me that if I'm not there before the surprise, she's going to start a rulemaking process.

MS. VAN der VEER: We don't want to have that so one is enough. I also want to make people aware when you come up to give your statement that there may be clarifying questions from Rosie and David, so we're also trying to allow time for that because we want to make sure that we really understand the point that you're trying to make. So if there is any follow-up, we want to make sure Rosie and David have time to make sure they understand exactly what you're trying to get across here.

So with that, we're going to call up the first pre-selected panel, Rob Waldron and Maryalice Crofton and Maureen Barrows. Could you please come up here? Rob will be first, followed by Maryalice, and then Maureen, and then we'll take questions. We're going to get through all three individuals, and then I will ask Rosie and David if they have any questions for the panel.

MR. WALDRON: Well, first of all, thank you so much for engaging us in this process. It's good to be here and good to have an opportunity to give feedback and hear from you, and all of us are so appreciative of this. I did note, though, the way the rules work, that no one was on that little clock until after the grant-makers sat down.

I think it is so helpful to hear on both sides, and just before I start, as I've listened, and I've shared with some in the Corporation, I actually think in some ways there's more of a middle ground than we might know as we start to enter this process, and I'm so appreciative to go through this listening process.

In your mission statement, the Corporation expresses a desire to provide opportunities to engage Americans in service to address the nation's needs in order to achieve direct and demonstrable results. Your vision statement is to be entrepreneurial, innovative, effective, and efficient, and I'd like to focus a little on effective and efficient, and to be a good steward of the taxpayers' dollars.

Like everyone here, I'm a taxpayer. I used to be in the private sector for a long time, so I must say that my contribution to taxes, now that I'm at Jumpstart, has declined quite a bit, but I, from that experience, have been a believer in competition, and I believe that competition makes us stronger and leaner, and I think it's important to have a competitive process to grant-making and to choose organizations based on the impact and their demonstrable results.

A thing that concerns me that I see in the Federal Register is some energy that would be anti-competitive, that would go against the taxpayers' best interests, and would be anti-quality, and that has to do with this concept of time, that over time, you reduce a grant or eliminate a grant of an organization because time is the factor and not quality as the factor, and I think we should be agnostic to time and focused on quality.

In any given year when you look at an organization, in our case, Jumpstart, we work with three to five-year-old children and pair them with college students to teach early literacy skills. We assess every child in the beginning and every child at the end. An example of our work in the last budget from year to year is that we were able to increase the number of children served by almost 40 percent, and we only increased our AmeriCorps participation in grant by -- I don't have that figure in front of me -- but by about 20 percent. So, in other words, we're becoming more efficient.

The second thing is that we've generated better outcomes for children, more points for the kind of thing that we're trying to generate over time, and any investment choice that says that as you become more efficient and you produce better outcomes, that the capital flees because of a pre-set regulation is inherently going to lower quality, particularly if that investment choice is going to go into an organization that produces less quality.

I said, and I think it's important that you know, that I am agnostic. If some new person or new organization comes along that produces a better return for the number of people you're trying to serve and the number of outcomes you're trying to get with both the people who serve and those who are served, in our case, children, then let it flow to the new organization.

The other thing to keep in mind, a lot of people ask me well, Rob, you have Starbucks as a funder, why do you need us? These decisions are made at the margin. With more money, we will serve more, and any appropriate cost decision or investment decision, I should say, is made on a marginal basis, and with more money, we serve more, and that investment should be compared to someone else that you have.

I think the last thing is there is no fear in my mind with AmeriCorps at any kind of oligopoly, you know, that there are only two organizations that get AmeriCorps funds. It is so widely dispersed that I wonder for myself how a small organization could handle some of the logistics of dealing with AmeriCorps.

As it is, you know, it's expensive to do some of the paperwork, which is necessary, I understand, but you're never going to get to the point -- you know, I think you have 900 now or 500 now, I don't know the number -- where it's going to get down to two or three and you have some kind of oligopoly. So those would be my thoughts. I see the red light and respect it.

MS. VAN der VEER: Go ahead, Maryalice You're next.

MR. WALDRON: I thought we were going to ask questions after the panel.

MS. VAN der VEER: We are.

MS. CROFTON: I'm Maryalice Crofton. I'm the executive director for the Maine Commission for Community Service, and some of the things that I am about to say have been vetted to the board and around the State of Maine, so I am not speaking on behalf of myself, and I've submitted written copies as well. In the interests of covering time, I'm just going plunge in, and I apologize for reading, but it will keep me on task.

We're feeling that it's time for AmeriCorps to acknowledge its actual roots in volunteer administration and community development, that the Corporation should seize the opportunity through purposeful language in the rules to connect AmeriCorps overtly with community development and voluntary administration.

In doing that, you could pave the way for local organizations to make both internal and external connections with partners whose mission and visions, services schools and evaluation strategies as well as their expertise are similar, but they are often puzzled by the jargon of AmeriCorps.

It is no surprise to us that the recent evaluation and publication around the capacity of volunteer organizations and their volunteer administration practices shows what it does, that they are not widely used. It's our contention that AmeriCorps' complexity is because it demands full implementation from the very first day of best practices and volunteer administration, and that without that being overtly stated, then the fact that many organizations are not familiar with those best practices makes it look complicated.

You can do a whole lot for the entire volunteer field by labeling those best practices as well as requiring their implementation which you already do, and helping organizations build their capacity through that.

The same thing with community development. With the jargon that we use, it is very hard to connect with community development, community capacity-building organizations. That is not because we don't share the same principles underneath. It is because we don't overtly acknowledge that those principles are the basis on which we are operating.

The other thing that we feel the Corporation must resolve once and for all the confusion surrounding the identity of the ultimate beneficiary service performed on any AmeriCorps banner, it's Maine's contention that it's the community that is the ultimate beneficiary, and that has to be very, very clear.

And some of the things that you did or that the Corporation originally had as emphases in its language and its description of what it does have disappeared, and therefore, the beneficiary is unclear to people. If service is the strategy, and the community is the beneficiary, then one of the most critical predictors of achieving change is objective evidence that the proposed service is going to meet community need, and that there is prior research, prior evidence, that that service is going to affect what is happening.

AmeriCorps programs are not funded to do original research, and they cannot be expected to. There are models in community development, in community capacity-building that you can take from that will show you how to get that performance measure high between what is done, the quality of what is done, and the likelihood that that change that the community wants will occur.

I'm going to switch to sustainability and leveraging and just plow through our thoughts on that, but I do need to acknowledge that there are about four pages before that in what you have before you.

Sustainability and leveraging, it's our belief that those two issues are tied together because sustainability has so far been defined only in terms of cash, and because

AmeriCorps' public conversation for the last two years has been focused on individual members rather than community, the role the federal dollars play in leveraging resources for the benefit of the community served and not the organizations that receive the grants has been lost in the entire conversation. It's not that it's not there. It's that it's been lost.

We urge you to take a look at the fact that there are more things than cash to sustainability and leveraging and to look at leveraging which can be defined differently as both unanticipated resources that can be reported, used to be reported to you are no longer tracked. They may not need to be part of the fiscal reporting. Match should be those things that qualify an applicant to receive your funds initially, and anything that is generated afterwards can be looked at as leveraging. Those pieces have disappeared.

With regard to federal cost per share, it's our argument that the Corporation runs a high risk of encouraging poor quality service, of demonstrating very, very bad volunteer management, and of restricting participation through a narrow range of socioeconomic classes in America if you continue to push that. There are ways that you can do that. We suggest some of those ways in our testimony and encourage you to take a look at that.

MS. VAN der VEER: We'll hear from Marie now. You get five minutes.

MS. BARROWS: Good morning, and thank you very much for the opportunity to be here. I'm Maureen Barrows. I'm a Rockingham County Commissioner in New Hampshire, and I also was one of the co-chairs of the founding of City Year New Hampshire, one of the first non-urban City Year in the country, and I'm very proud of that. As you might expect, I'm very proud to be part of City Year.

There are times I feel like a dinosaur because the majority of people that are involved and work with young people are far younger than I am, but I truly wasted my youth. I really was a hedonist and worked as a barmaid and waitress down in Miami Beach and over in the Bahamas, so because of that, I'm paying my dues now so the father will let me in upstairs.

I have a common denominator with you, David. It's very important to me to look for different degrees of separation. I also am leaving immediately to go to a surprise party for my 35-year-old son tonight, and since I'm older than your mother-in-law to be, please tell her the best is yet to come. You really get away with murder when you get old. Nobody asks you for an ID or anything. You can go into Skeeters, and nobody's paying attention.

So anyway, as a Rockingham county commissioner, I have access to a great number of influential people, but I also know where the different pots of money are, and it's very difficult to fund a program in New Hampshire. There is government money available, and City Year does receive funding from three New Hampshire counties from a pool identified as 6 percent incentive funds. These funds are an appropriation of money from the State of New Hampshire for programs to enhance the lives of young people to provide alternatives such as mentoring and after-school activities.

These are in areas which are in dire need of such services. It's available both for startup and to sustain programs. We do not use the 75/50/25 rule because we have learned over the years that many wonderful programs died on the vine as a result of that very

narrow parameter, and also the 6 percent incentive fund is subject to elimination or reduction every two years at budget time, so we can't totally depend on that for anything.

New Hampshire has a population of slightly over 1 million people, and is one of the fastest-growing areas of the country. AmeriCorps funding is critical to the success of our City Year program as our base of private sector funding is limited. Although we increase in size each year, there are few major corporations to appeal to for funds. We do have active ongoing fund-raising, and the board is constantly in search of new sponsors.

Many worthy and necessary programs are competing for the same dollar, and federal dollars help to stabilize the uncertainties of foundation and private sector support. In the past, New Hampshire has been the recipient of what we call Title 5 delinquency prevention funds and also juvenile accountability incentive block grant funds, and funds from these federal programs are no longer available to the counties, with the result being the elimination of effective programs such as peer mediation in some of our schools.

Although the citizens of New Hampshire are most generous in volunteering their time, New Hampshire ranks 50th or last in the nation for percentage of total adjusted gross income donated to charity. That astounds me because the people I know and work with are extremely generous both with time and money, so I don't know how we rank 50th. I've never quite been able to figure that out. Maybe New Hampshire gives too much for political campaigns, I don't know.

After all, I grew up in Somerville here right on Winter Hill which I'm very proud of as well, and since you talk about being the first in the nation in services and also having town meetings, we're the first in the nation primary, so we get our spot in the sun every once in a while, but that surprises me, that statistic.

New Hampshire has 259 foundations. Now, as generous and thoughtful their support of non-profit organizations, are often forced to make difficult choices between programs due to limited funds. There's a misnomer that national non-profits are, quote, unquote, getting fat at the trough or are considered on the dole, and that is not the truth. There is no basis to that whatsoever in the State of New Hampshire. I can't speak for other parts of the country, but I would doubt it's not true there as well.

I'd like to request the Coalition for National Community Service to allow each state to set matching requirements for AmeriCorps programs, and that these guidelines be flexible enough to allow for exemptions in areas where there is not a strong private sector. Thank you very much.

MS. VAN der VEER: Thank you so much, Maureen, for that very thoughtful and entertaining statement. Now, Rosie and David, do you have any questions for the three panelists that we just heard from?

MR. EISNER: I have a couple. Rob, thanks for walking through the issue of time agnosticism, being agnostic relating to time. In your statement, you talked about how your program is becoming increasingly more efficient and driving better outcomes, and you could say actually that's not an approach to agnostic time. If we were, for example, to require over time programs become more efficient and derive better outcomes, you

know, you could either say that cash remains the same when production goes up, or production remains the same than the amount of cash required to achieve that goes down. Efficiency can go either way.

I guess the long and the short of it is do you think it's fair to the Corporation to require that over a period of time our grantees become more efficient and derive better outcomes?

MR. WALDRON: I think if you sat on a Jumpstart board, that you'd require that, but I think the most important thing for me is that each year you have a pot of money, and just like in a business, if some new competitor and somebody comes out with something new that is meaningfully better that involves more people, leads to better outcomes for the communities we serve, that you should switch, and if you don't see that -- or you should switch some of the time, and if you don't see that, if you see someone just continuing to have very high quality, that you should stay.

While I like the story of what happened to Jumpstart and demonstrating the success that we've had as an indicator of our overall quality and success and where we're headed, each year when you have a pot of money, what matters is that that money be used in the most effective manner towards the mission statement and outcome, and I would think that you would start to go down a path of lacking period of decision if you went solely on that metric.

I mean, you might want to have that metric to encourage quality and actually be able to rank quality over time with an organization, but as a major component of it, I think you would start to get away again from marginal decisions which I imagine are hard to make for so many different types of programs.

MR. EISNER: Following up on this, would you agree that the ability to raise community funds or outside funds is a fair proxy for attracting broader support for the community?

MR. WALDRON: You know, I'm so new at this, I can't comment on it. Jumpstart is a model that says that not enough is being spent on early childhood education for these children, so we need to deliver more resources. There are other models of an organization I think very highly of, New Leaders for New Schools, which is bringing principals from different backgrounds that is actually switching costs from what they're already doing to another, so I would say that would depend.

It is possible that it's an indicator, but the one thing I think you also should be very cognizant and careful of is that while the current AmeriCorps guidelines say that there should be a one-third match, that's a one-third match of the things you're willing to fund and don't accurately reflect what we have to do.

My pay is not AmeriCorps pay. Many of the people who are involved in our program in education and training and to getting those private resources in the AmeriCorps program, we get about 25 percent of our funds from AmeriCorps, so while your rules say that we have two-thirds and then the one-third match, that's not the effective way the budget is when you put all these things together.

And I would love a rule that accurately reflected the participation that is needed to run one of these programs. For example, I probably spend 10 to 15 percent of AmeriCorps

funds on finance people services in order to keep compliant which I don't get to charge for, but that would be my thoughts.

MS. CROFTON: Could I ask something? Two questions. One is that I think the Corporation at some point needs to take a look at and accept the fact that there's a tension between national direct grantees who are non-profit organizations, and I say that from having been E.D. of a non-profit, and I had a completely different view to three years convert me to the public sector, and state commissions or state government bodies that receive grants, and then use those in a different context with their policy needs and those sorts of things.

That's not a right or wrong. That is two different animals that you're dealing with. Many of the states have a schedule of graduating match because we had an awareness that there are multiple needs in our states, restricted resources to meet those needs, and the feeling that we can't marry anyone. The schedules that I'm aware of are nine to ten years long before there's some kind of a flip. For instance, in Maine, we'd go to a flat fee that we will maintain people on for as long as they want to.

I wanted to comment on your question about cash as a proxy. I think that's only a fair proxy in those areas where there's a driving economy. As one of the three states in the nation with the fastest-growing poverty level, I can tell you it's not a proxy that we can use. We can use in-kind as one of the evidences, but you're talking about cash now. That is not one of the fair ones, and if the community is really the ultimate beneficiary, then that has got to be where you're looking for, is the community need being met, and are people moving on, and we have some suggestions about replication criteria and replication language to go back to your statute and use language around that.

MR. EISNER: I have a question for Maryalice. You had a very interesting point that we should be funding programs whose underlying benefit model has already been proven, and I think, to connect the dots, what you were saying is that we shouldn't be requiring programs to prove the efficacy of their approach.

MS. CROFTON: No. You have to understand it's been about 15 years in substance abuse prevention in the community, and it's been an awful lot of time in front of state legislators and other people who said, you know, show me that within 12 months, you have accomplished what I wanted.

What I am saying is that if somebody wants to take a particular service activity and apply it to a community need, they ought to present a convincing argument that there is a logical connection between what they propose to do and the need, and that can be changed or affected, and that the burden should be for them to find, either in research or prior existing program or some kind of an indication, that this particular approach will affect the need.

So what I'm not saying is that they can only take proven models and replicate them. There should be room and there has to be room for taking something that works somewhere else, tweaking it for local or creating if there's nothing preexisting, but they have to cite that there's a logical connection in there, and there are other federal agencies that can show you how that's been done.

MS. MAUK: I just have one quick question for Maureen. You said you didn't agree with doing a 75/50/25 kind of scenario. What do you believe is workable?

MS. BARROWS: I'd like to see flexibility in that requirement. You know, in some cases, it works. In New Hampshire, our experience has been that it has not worked, and I would go back probably 25 years, and when we first funded many programs to the amount of, in some cases, a hundred percent at the end of one year or three years or whatever, they usually were not able to fund through the private sector.

We had to change the rule in New Hampshire. We don't do it that way any longer, so I really don't have a suggestion of how we could do it because we certainly have tried over the years. New Hampshire's an extremely frugal state, so if it could be done, it would be done, and government money, the constraints are not on it in that fashion any longer, so I really don't have a suggestion for our particular area.

I think in metropolitan areas such as New York, Boston, Detroit, et cetera, they're probably perfectly fine and probably work perfectly well there, but if we're going to develop other non-urban programs in the Midwest or in the south or wherever the private sector is limited such as New Hampshire, I think that has to be addressed very carefully, and perhaps another set of rules made.

MS. MAUK: We have been hearing all across the country that please consider the various ways that urban and rural communities are so very different.

MS. VAN der VEER: Thank you so much. We are now going to bring up the next panel. We have had one person from the pre-selected panel who is unable to make it. That was Jeff Swartz of Timberland who will not be with us today, so I would like to have Peter Frumkin and Jim Donahue please come up to the table. The next three people to be on deck right up here in front -- has Michael Kineavy arrived yet from the City of Boston? I know he is going to be arriving and will speak as soon as he gets here, so we may add him in the next panel, but I need Robert Rue and Bob Coates on deck, please. Can you come right up here, please? Thank you. You are our next speaker. Five minutes, please.

MR. FRUMKIN: Thank you. My name is Peter Frumkin. I'm associate professor of public policy at Harvard's Kennedy School of Government where I'm affiliated with the Houser Center for Non-Profit Organizations. Thank you very much for giving me the opportunity to come here today.

As I look through the list of key issues you presented in the flyer that are to be factored into the rulemaking process, I have a couple of rational issues I want to share with you about that list. But first, I think it's useful before we get to the question of how should this rulemaking process proceed, what should it focus on, start with the question of what is AmeriCorps program trying to achieve. The only way to get clear on what it's trying to achieve is to get some sense about how it should design rulemaking and think about that.

I just want to focus on three big areas I think AmeriCorps is trying to make a difference in. The first is when I look at AmeriCorps and these programs, I think of affected communities. These programs are trying to transform communities, they're trying to build social capital, they're trying to get things done, they're trying to really affect big picture change in communities.

But that's not all these programs are trying to do. They're trying also to affect individuals. They're working with countless people, young people, trying to energize

them, trying to get them to engage, trying to build human capital, so these programs are trying to do at least these two things very clearly. They're trying to transform communities, and they're also trying to change individuals.

But that's not all they're trying to do. There's a third function of these programs, and that is that they're trying to build strong non-profit organizations, so somewhere in between the corps members at the individual level and somewhere between the community at the kind of broad macro level, there's this kind of intermediate goal of building strong organizations, and I think it's this intermediate level where the rulemaking really has a particular role to play, and good rules can facilitate achievement of important goals, and disorganizational bad rules I think could be very dangerous.

Now, when I look at the list that you provided, the first item on that blue sheet is sustainability which pertains to this mid-level organizational level of activity of AmeriCorps. Sustainability is a fine goal, and it makes a lot of sense, not in the sense we don't want to create organizations that can't go on that are struggling and that don't have the means really to carry on in the absence of public support, but I think sustainability is a very narrow concept.

I think beyond sustainability there are a number of other considerations about the effects of AmeriCorps and federal funding of volunteer activities that need to be considered. I just want to nominate two. The first is autonomy. In funding these programs, we're not just trying to create sustainable non-profits with capacity, we're trying to create autonomous, innovative organizations that are able to do creative things.

So the idea of sustainability is valuable and it's an important factor to consider, but it's not enough. One of the reasons government acts through non-profits is that it wants to have a plurality of approach, a plurality of vision out there for how to get things done, so in designing rules and thinking about rulemaking, I really would submit to you that taking very seriously the value of autonomy, non-profit autonomy, at this mid-level, this organizational level affects what the program is trying to achieve, and it's absolutely critical.

The second consideration I would put on the table is that in designing the rules, you also have to have very clear focus on equity, inter-organizational equity. Government is a key funder of non-profits across a whole range of areas, but we heard from the last panel that some 900 non-profits are participating. That's wonderful, but there are 1.6 million non-profits out there. It's a huge universe, and in designing rules, I think it's absolutely critical to take seriously the idea that we've got to give a lot of organizations a chance to participate in this program, and you have to design rules that facilitate a lot of ease of entry from the broad universe out there.

Now, what's interesting is that there's a lot of research that's been done on the question of how to structure rules and interactions between public and non-profit organizations to facilitate autonomy and equity, but there's also a very cautionary group of studies that are out there that I command to your attention that show that poor rulemaking can lead to bureaucratization, pacification, deradicalization, and homogenization of non-profit organizations.

You need to take seriously the risk of poorly-designed systems because they don't just have potential effects on sustainability. They have effects on the very nature of the

autonomous and individualistic nature of these organizations that you're working with. In particular, I'm thinking about the research of C. Smith, Susan Broadstein, and Kirsten Braumberg that really have shown that poorly-designed rules, poorly-designed systems for interacting public and non-profit organizations can lead to these dangerous, dangerous effects.

I want to say something about performance measure because I think performance could be a potent tool for balancing the value of autonomy with the needs of the Corporation for accountability because performance measure is a potent tool for connecting both sides of this equation. I've got views about that, and I'd like to share them with you at some point, maybe later, but the key to it, it's just as important to listen here as you do the rulemaking, and it's also critical to listen when doing the performance measurement designs because non-profits have a lot to say about how best to structure these performance systems, and unless you listen, unless you design these things mutually, you're not going to get the payoff in terms of accountability, and you're not going to get the payoff in terms of preserving autonomy.

So just to wrap up, I think you came up with a good set of criteria and issues to think about as you do your rulemaking. I just would like to put forward kind of a core value of non-profit autonomy that should be factored into how you develop these rules, and I'll stop there. Thanks.

MS. VAN der VEER: Thank you, Peter. Jim, go ahead and step up.

MR. DONAHUE: Thank you. Good morning, everyone. My name is Jim Donahue, and I am the founder of the Highland Charter School in Providence, Rhode Island which is a public K through 8 charter school. We've been open now for four years. I know my colleagues and students probably wish they had one of those lamps when I'm talking to them, too. I've been fortunate enough since we opened Highlander to have several partnerships with either AmeriCorps-funded programs or Corporation-funded programs, and that's been a real blessing for us.

I'd like to talk a little bit and offer some comment on the qualifications for tutors spelled out in the rulemaking, and I want to start at the bottom actually of H.R. 4854 in talking about No Child Left Behind because I think when we talk about really effective tutoring programs in our experience at Highlander with our students, it's less about No Child Left Behind and more about one student at a time.

My concern with the requirements that literacy programs are based on scientifically-based reading research is that they become just that, programs much like the curriculum that schools are using right now for teaching reading which is a one size fits all curriculum. One of the beauties of after-school tutoring is that it allows for a tutor and the professional educators in the school to connect around individual children and to figure out what unique approaches may work for him or for her to help them in the classroom.

So Sally Shaywitz who co-directs the Yale Center on attention with her husband wrote this great book called *Overcoming Dyslexia*, and in the book she says on the basis of all of the brain science research that they had been doing down there, that schools typically continue to function the way that they functioned 40 years ago where they come up with a curriculum for where the curriculum is used for every single child, and some children make it and some children don't.

If we went to our doctors with an allergy condition, and they just basically gave all of us the same treatment, then we wouldn't accept that. We would want them to sit and listen to us, think about our lifestyles, think about our own family histories, our living conditions, and I feel like what AmeriCorps-funded programs have the opportunity to do is to really think about that one student at a time and be able to think outside of the box because my conversations with my colleagues, even with NCLB right now, there is the feeling that there are definitely students who are going to be left behind, and we don't want to be replicating those strategies that are failing for them during the school day after school.

So I would propose that service partners, and Highlander is really excited about this, embrace the opportunity to work with tutors to come up with training programs that work for those school communities, for those students, and think about it very individually and personally for kids versus in terms of one program for all students.

I want to go back to the beginning of H.R. 4854 and talk about the requirement of a high school diploma be held by all members who are serving the students. One of the great things about AmeriCorps programs at Highlander is that they bring a wide diversity of community members into the school, and included in that diversity are certainly members who do not have high school diplomas right now.

Patrick Finn wrote in this book, *Literacy With an Attitude*, that most public schools for poor kids are educating them to be functionally literate or instructionally literate but not powerfully literate, and what he means by powerful literacy is that children really understand how language, reading and writing and speaking and listening, can help them to change the social structures in society, that it's not just about reading the directions, and it's certainly not about being able to go to work somewhere for somebody else, but it's about changing a system of oppression that may exist for them.

Then in order to do that, he argues, that it's not just about having scientifically proven reading approaches, but it's also about connecting children with members of their own community, connecting them with people whose experiences may, in fact, be similar to theirs, and we see that with the diversity of AmeriCorps members who work at CVS Highlander, and that those members, with the correct training and support from the service partner and from the program combined with the experiences that they bring and the affinity with some of the children in their role in the community, can bring, we hope, powerful literacy to our students and not just functional literacy. I'm going to finish on yellow.

MS. VAN der VEER: Thank you. I appreciate that very much, Jim. Rosie and David, questions for Peter and Jim?

MR. WALDRON: Peter, I was having a little bit of a hard time following the last point you made -- you were probably accelerating because of the light -- about how does performance measurement balance the interests of autonomy? In fact, what I hear back from grantees and what we worry about at the Corporation of performance measurement is that every step we take towards imposing performance measurement is actually going potentially one step too far in imposing our sort of mission values on organizations that should be servicing their own mission.

MR. FRUMKIN: The best performance measurement systems are ones that don't just fulfill an accountability function, where you're just reporting out to the authorizers and

trying to appease the authorizers. The best performance measures are ones that are mutually designed, where the funder and the recipient are working together to define the critical measures.

If it's done right, performance measurement can actually empower organizations, give them a sense of autonomy, give them a sense of involvement; that is, they're part of the process, they feel like their input is heard, and that the performance measurements that are devised are not just reporting out to the authorizer, but they're actually usable, that they can be used by the organization to get better at its own work.

So when you have some kind of mutuality, when you have listening and kind of co-design and co-production of these performance measures, then I think you can do more than just create accountability systems that are viewed as a one-way burden for the non-profits. So all I was trying to suggest is that just as you're listening here, I think it's critical to listen very hard when you do performance measurement design because otherwise, you're just going to create, as you say, and you're right, systems that are a burden to the non-profits rather than ones that can take seriously their individualistic missions, their special concerns, and their desire to use performance measurement for something that's actually practical, that helps them do their work better. If they can do that, they'll feel like they're part of something that's meaningful.

MR. EISNER: Another question, Peter. You mentioned several times the possibility of the poorly-written -- the bad things that could happen as a result of poorly-written rules, and that somehow that was partly as a result of the association with the funder. Do you have a point of view as to whether the solution there is one of enabling over a period of time less of an association or less funding, or is the solution more in terms of how the requirements around the funding are articulated, or is it a combination?

MR. FRUMKIN: It could be a combination of the two, but I think more the latter. There's a good case being made that serious pursuit of the other competing objective I mentioned briefly, equity, could be a very potent way of also pursuing autonomy and taken seriously the idea of not getting too deeply entrenched into the actual operations of the organization, just supporting.

If you have a view that a key value that's going to be affirmed through the kind of rulemaking and the process that you're going to put in place is, in fact, equity and access, then you have a sense of you're going to have a program that's open, that's going to have some permanence, it's going to have penetration by new organizations, and that very process of creating inter-organizational equity in terms of access to these funds would also simultaneously speak to the autonomy question, because if you have people rotating through, you have people coming, having access to entering rather than people just constantly in the program, you're also satisfying at the same time the autonomy issue and the equity issue.

I didn't get a chance to connect those two issues up but, in fact, they're very deeply connected. An equitable system that really is open and easily penetrable is also one that promotes autonomy, and it doesn't build troublesome relations.

MR. EISNER: Thank you. I have a quick question for Jim. Jim, I appreciate the points you were making around the need for flexibility, the need for special tailoring programs. If we push your argument all the way to the end, are you saying that there is no common set of functional skills capacity that we should require a tutor have?

MR. DONAHUE: No, not at all. I think that there are definitely -- there are standards that we want to have in place given the program, given the students, given the community, and I do think that there needs to be training, and I think it needs to be ongoing. I'd love to see service partners engaged in that training and take responsibility for that.

What I'm concerned about is that after-school tutoring programs are going to become -- are going to look in some ways like classrooms look in that you have one standard program, and so what I'd love to see is the opportunity for communities, school communities or communities serving the kids, to come together and figure out what are the practices that we need to have, but they may not be the same practices for every student participating in the program.

For instance, at Highlander, we not only have students from our own school, but we have students from two of the neighboring schools who participate in one of the AmeriCorps programs after school in which tutoring is a component, and it seems to me that just there, it's important that -- more important to me as the host partner is that the program is connecting with the educators who are working with those kids every day to figure out what are the specific needs for each of these children, what are the approaches that have proven successful, how can we give you as much training as we can given your talents and capabilities.

Then how do we make connections around real work for the kids so that it's relevant for them. So I do definitely think that there are some core practices and standards, but I don't think that they are always the same for every child and every program.

MS. MAUK: Just for the sake of time, I'm just going to comment here and that is that what Peter talked about wanting our partners to be autonomous, remain autonomous and to have interagency equity is something that -- those are some of the values I think we are trying to achieve. It's how we get there that's so difficult, and so I hope that both of you in the areas that you've spoken about would agree to kind of help and shepherd through this with your written testimony and perhaps can help us a little further in how actually that gets it down on paper in the next month or so and how that works, so thank you.

MR. EISNER: I would also note in whatever further comments, it's so much easier to identify cautions than it is to identify the alternative proposals. I think both of your testimony has been extremely helpful and followup in what we can do positively to move where we're trying to go would be very helpful.

MS. VAN der VEER: I would just say for the record that we are right on time, so we're now going to move forward with the people who have signed up here onsite, and thank your pre-selected panels for their participation and their input into our process. I understand Michael Kineavvy from the City of Boston has arrived, so I'm going to ask him to come up here to the table, and if I could just beg Robert Rue's forgiveness, apparently Bob Coates and Todd Frederick are joined at the hip and need to go together, so we're going to ask them to come up here, and we're going to put you, Robert, with the next group. Todd and Bob, go ahead.

The next group is going to include our friend Robert Rue, also Molly Baldwin and Karley Ausiello. I may not be pronouncing those names right. If you could come on up here down front with Robert, and you all will be on deck, so that when this panel is finished,

we'll cycle you on up, okay? The first speaker will be Michael Kineavy. Michael, I know that you have arrived late. Each speaker has five minutes, and at the four-minute mark, the yellow light up here will come on, and that will be your warning light, and then you will get a red light at the five-minute mark. So we thank you so much for being here, and we will look forward to hearing your statement.

MR. KINEAVYY: My name is Michael Kineavy. I'm the director of the Mayor's Office of Neighborhood Services. I make my living my going to community groups and meeting them, and this system is great. It would be wonderful if everybody could get all attached to an ejector seat to eject --

MS. VAN der VEER: Do you know where you can order one, and if you'd like to borrow my light, I can make a deal with you.

MR. KINEAVY: That sounds good. Thank you for having me today. I've heard a lot about quantifying in the earlier discussion measurements about how we decide whether these programs have value, whether they do not, what can we change. So my perspective is a little bit different. I'll tell you what I see in the streets of Boston. I'm out in the neighborhoods on behalf of Mayor Menino every day trying to hopefully work toward positive change.

I will tell you starting out that if it weren't for AmeriCorps, Boston would be a lesser place. This city wouldn't be as strong. It just wouldn't. We've had a lot of budget cuts over the last couple of years. The school department itself has last year received a 50 million-dollar-some-odd budget cut. We put some of that money back, we've had some reserves, but our ability to do the things that we once did has diminished.

Even when we were able to do those things three years ago when we had more money, we couldn't get to the things that mattered as much as the teaching and learning in the classrooms. It's the after-school programs, it's the volunteer efforts, it's the things that AmeriCorps City Year does on a regular basis. I would say that because of the funding, it's important and I think there's a lot of value in consistency and not having a time frame on funding, so that we know that year in and year out, we can depend on the programs that are in place.

I mentioned the fabric of the city earlier. A lot of the stuff that happens in our schools, no one on the outside really knows, but if you're involved in a school, you know about it, but if you don't, you really are unaware of the great things that happen. I think that in attempting to quantify what happens in terms of the programming done by AmeriCorps, I think it's important to look at it from two different angles.

Try to consider the repercussions if these programs didn't exist, so in the void, with nothing to replace these programs, what would happen. The poet Langston referred to a dream deferred, and I think that we need to think about that concept as a guide in terms of quantifying what we have on the table and its value. I think of the young person from Jamaica Plain maybe in school, English as a second language, without the AmeriCorps volunteer literally holding their hand after school and telling them that it will be okay.

So in the void, does that young person fall through the cracks, and then what do we as a society, specifically Boston, pay on the backside of that? Are there legal problems, are

there other problems, just because this young person's hand wasn't held towards a brighter future or towards the belief of a brighter future?

As you quantify the other side, I think that we should cast as wide a net as possible because AmeriCorps is in the business of planting seeds, and in many instances, we want to know when our dollar goes in, this comes out, so it's easy to quantify those things. It's more difficult to look long term at that young person in Jamaica Plain seven, 10, 12 years down the line, what happens in their lives because of the influence of AmeriCorps.

So to expand the horizon in terms of attempting to quantify in the long term, and then on the other side, on the service side, what happens to the corps members, you know, how are their lives changed, how do they improve the fabric of our society, how do they improve the standard. President Kennedy talked about a rising tide raising all ships. I would say that AmeriCorps is part of that ebb for sure, and that we need to think of it long term as well.

The mayor, on a quarterly basis, has City Year members sit with him, roundtable discussion, not canned, and asks them what is right and what is wrong in this city, and he makes decisions based on that. Well, the school I'm in, the lights don't work properly, or they don't have enough materials, or the area around it is dirty, and those things get changed.

We're actually working with Karen Freed who is the face of City Year because of her servicing commitment. We're working with her on developing a form that people from AmeriCorps and City Year can give to us so that we get those things done, so the value of AmeriCorps in this city is very difficult to quantify, but again, the city would be lesser without AmeriCorps' presence. Thank you.

MS. VAN der VEER: Thank you very much, Michael. Before we begin with Bob, can I just ask you to be honest with me. Those of you who were asked to speak or came up to sign up to speak, were you told you had three minutes? Thank you. I appreciate that very much. Three minutes is a really short amount of time, but I think if we're going to get everyone in, forgive me for saying it was five minutes for the pre-selected panel, three minutes for those who signed up onsite.

We've been doing these rulemaking meetings now, this is the fourth one, we're doing a fifth one, each one's a little different, and I'm afraid I got it very early this morning, and I forgot that I was in Boston rather than Dallas where we're doing four minutes, so anyway, we have now three minutes, so I'm going to ask you, Bob, to try to do the three-minute thing. Thanks.

MR. COATES: I work in the City of Boston now out to Worcester, rural Worcester in Massachusetts, and given the need for speed, excuse me, but I'm going to read. Good morning. My name is Bob Coates. I work for the Student Conservation Association, the nation's oldest and largest youth conservation service organization headquartered in Charlestown, New Hampshire. Thank you for the opportunity to address the issues you are considering which are vital to the future of national service. I'll be submitting a more comprehensive version of this testimony in writing.

SCA has partnered with AmeriCorps for ten years. We had, up until last year, four state competitive or formula-granted programs in New Hampshire, Massachusetts, and in New

York. We also had an educational award grant providing awards to a thousand or more of our conservation volunteers serving all 50 states. In fact, we are pleased to be one of the 28 new recipients of educational awards announced just last week by the Corporation for National Community Service. Thank you for renewing a partnership with SCA. It feels good to be back. We have, in fact, felt the loss of our partnership and our connection to national service this past year.

I want to briefly, ever so briefly, comment on three of the specific rulemaking areas and then introduce the gentleman sitting next to me who can provide perhaps a unique perspective as our partner in the Massachusetts SCA parts AmeriCorps program.

Sustainability. This past year, we experienced what we hope will be a one-year unwanted, unpleasant experiment in forced sustainability, and the experiment was a failure. The pause of these repercussions meant all four of our state competitive or formula SCA AmeriCorps programs were de-funded. We were not able to replace the federal AmeriCorps partnership funds, not even close. It is simply impossible to raise \$248,000 through state or private funds in rural western Massachusetts.

The area is rural and last resources support the cause of our program. My fear is that increasing the match requirements or decreasing or eliminating the federal AmeriCorps partnership funds will eventually take the national out of national service. That would be a shame, and Congress needs to be convinced that it would be a shame. It would be like asking international NGOs to run the Peace Corps with no federal funding. It just wouldn't be the Peace Corps.

Exit strategies. The requirement to compete for AmeriCorps grants prevents AmeriCorps funding from becoming an entitlement program. Why not allow experienced programs to continue receiving AmeriCorps funding if they meet high standards of quality, national priorities, and compete successfully? The only programs in need of an exit strategy should be programs that don't measure up.

Environmental priorities. The portfolio of environmental AmeriCorps programs is small. We have heard no larger than 5 percent. The demand by young people to participate in a conservation or environmental AmeriCorps program is great. We would ask that the Corporation re-balance its portfolio to better reflect environmental needs and youth interest.

I mentioned that we have felt the loss of our national service connection over this past year. It's true. We lost our direct connection with AmeriCorps, our funding, and our ability to continue the high impact national service program we were running. We want to work hard to run exceptional AmeriCorps programming, and if we do that, we need to remain your partner and we need you to remain our partner. Thank you for this opportunity to contribute to the dialogue on the direction of national service.

Todd Frederick is the acting director of the Massachusetts Department of Parks and Recreation. He's been an amazing supporter of SCA and AmeriCorps. SCA and AmeriCorps has partnered with Massachusetts State Parks for seven years. If I had more time, I'd tell you stories about State Parks that should be enshrined in AmeriCorps partners' hall of fame. State Parks has performed miracles for us, but they can't do it all. They need your partnership as well. I thank Todd for taking the time to come here. Todd Frederick.

MS. VAN der VEER: Thank you. Go ahead.

MR. FREDERICK: Thank you, Bob, and thank you for the opportunity to testify today, Mr. Eisner, relative to the rulemaking process. Sitting here in a series of hats, I have a letter prepared by the Secretary of Environmental Affairs that I'd like to read into the record, but I'll start with two comments about the program.

As Bob mentioned, it's been an extremely successful program here in the Commonwealth. It started as a first-ever residential environmental-based camp up here in Massachusetts out in Western Mass. in the town of Hawley. The population of the town is a little under a thousand, so it's certainly a rural setting. Seven years ago when we started that program, there were a lot of skeptics about the successes of it and how it was going to work both within the community and within our agency. There was a great debate about it with many of the staff that worked for me and participated in AmeriCorps in some form or fashion years ago in camps like that in the western part of our country.

As I mentioned, it's the first residential camp and the first environmentally- focused AmeriCorps camp here in the Commonwealth. The Commonwealth has been a large contributor as well our partners in SCA. Annually, through our ever-shrinking and tightening budget, we've been able to sustain about \$100,000 toward making that camp function with the match program from SCA.

We've also placed several hundred thousand dollars in upgrading the facility so that it can become a residential camp, and a lot of things have spun off as a result of that. This camp now has become integrated into the community. There have been members of the corps that have served as volunteer firefighters in a rural section of the town where they've really become part of the community.

There are community picnics held there each summer with the camp members. It sort of revitalized the section of the town that is primarily all state forest land, and this is the residents within that state forest piece of property, so it's really been a creative program in that way.

We've also been able to expand over the last several years to doing environmental legwork not only within that forest and the communities around Hawley but also across the entire Commonwealth from the Berkshires to the Cape, so it's been a tremendous asset there. I could share additional stories with you there. In its performance measures, each year going into the camp, performance measures are established, and we report on those at the end, so we do have a good trail of accountability.

The letter I'd like to read into the record from our secretary is as follows: "As Secretary of Environmental Affairs under Governor Mitt Romney, I have the responsibility to provide for the protection of our precious state natural resources and the enhancement of our recreational opportunities. We simply cannot succeed without the many public and private partnerships we have with non-profit organizations around the state which help us to leverage resources and volunteers.

"One of the most successful programs we've had over the last seven years is the AmeriCorps partnership with the Student Conservation Association of Western Mass. The SCA has completed hundreds of miles of community trails and park rehabilitation, thousands of hours of in-school environmental education tutoring, and has helped us

inspire hundreds of non-AmeriCorps volunteers to serve alongside them, and then to keep serving after they leave.

"We provide SCA with a rustic camp to house the AmeriCorps members" -- in the hundred thousand dollar funds that I spoke about -- "to defray costs of the program. We recognize the funding attributed to the Corporation for national community service makes it a partnership, and without it, the project for partnership cannot work.

"As you are aware, Massachusetts is managing its programs on a very tight budget. There are simply not sufficient resources in state government to replace the federal partnership dollars AmeriCorps brings to the program. We hope we recognize that, like so many other partnerships, the federal government, as with states, this one, too, requires continued federal support.

"Lastly, we hope you will continue to allow quality AmeriCorps programs run by expert non-profits like SCA to compete for AmeriCorps funding without arbitrary end dates. SCA, with its almost 50 years of experience in youth conservation services, brings incredible assets to help build national service in this country. Both the Executive Office of Environmental Affairs and its Department of Conservation and Recreation are proud to be partners with AmeriCorps." It's signed Alan Roykers, Secretary of Environmental Affairs.

MS. VAN der VEER: Todd, thank you so much for that letter from the secretary and for your statement, and we'll now go to David and Rosie to see if they have questions for the panel.

MR. EISNER: Question for Michael. Thank you for eloquently walking through the importance of AmeriCorps both short term and long term. I heard clearly and understand the difficulty in measuring benefits, measuring outcomes, measuring performance. At the same time, I'm wondering what your suggestion would be for how we determine who to give funds to in an environment where we're going to be saying no more often and saying yes less frequently?

MR. KINEAVY: One suggestion might be to allow the city where possible to help evaluate, so maybe offering us in a way where we could contribute to the evaluation to some degree so you'll have an external reference point that might help you with your internal measurement.

MR. EISNER: I guess I understand that, but in that case, wouldn't you have to be determining performance and outcome?

MR. KINEAVY: Right, but we have a 2:00 to 6:00 program, and this is our after-school programming, so maybe we can incorporate some of the programmatic aspects of what it does and to get our overall purview so that we can give some feedback, so it wouldn't be completely quantifying what happens, but it will at least present some evidence as to how this is working or pieces that might not be working. So I can ask the school department and the Boston Centers for Youth and Families to work on that together to try to get you some additional data that you could work with.

MR. EISNER: Thank you.

MS. VAN der VEER: Any other questions? Rosie?

MS. MAUK: Again, just sort of a comment that we've been hearing in the last few weeks from quite a few of our environmental programs saying that we haven't listed that as an issue for us to talk about rulemaking, and I really do think that it is about how we are putting together portfolios. We talk about it in a more general way, so we do appreciate the input that we're getting on that. Thank you.

MR. EISNER: I'm sorry. I am going to say something to the second set of presenters. I've heard and understand that the programs do expect that we're going to be bringing messages to Congress, and we're working on that, and yet, it's not enough for us when we're in statute told we'll reduce costs, we will do other things, for us to say well, let us talk with you about that. We do believe that there are ways that we can do it.

And in this discussion, we're placing the highest value on comments to us to help us figure out ways to do it that enable us to protect rural programs, that enable us to make the cost reductions within the program communities that can absorb those cost reductions. There's no disadvantage to the program communities that can't afford that, so I'm hoping that in future comments, we really need to hear how we do it right as opposed to please don't do it.

MS. VAN der VEER: Thank you very much to this panel and for your comments, and we are now ready to hear from Robert Rue, if you could come up to the table, along with Karley and Molly. You'll be speaking in the order of Robert, then Molly, then Karley, and then on deck I need Darlene Johnson Morris, Terri Sullivan, and Bruce Speight. Panelists, three minutes each, please.

MR. RUE: I'm Bob Rue, and I wear a number of hats as everyone in this room does. Mainly my role here today is as a member of the Connecticut Commission on National and Community Service, and I'm very proud to have served in that body for going into my third year. I have spent 40 years in the administration and teaching in higher education, public and private sector, rural and urban.

Briefly, a long time ago, I came to Boston as a consultant for the Mott Foundation. I was very impressed with it then and am still impressed with it. Ten years ago, as dean of the Urban College which is under Action for Boston Community Development, I stood out on the Commons to celebrate the beginning of AmeriCorps and First Year, and I continue to be impressed with that program.

I'm here as a commissioner, and my comments briefly are a little different, and they apply to a number of your issues, and that is how do you provide more resources, time and money, and, of course, time is money, to the staff? Connecticut has an outstanding staff that is way, way, way overextended. Under the very capable leadership of Jackie Johnson, I'm amazed at how much they do, and I'm concerned with the number of people who might submit bad proposals because they have community-based organizations that submit proposals, but there isn't enough people to work with guiding them, monitoring them, and I've read proposals.

Over the years, I've read thousands. I've read hundreds in the last couple of years. I recently was a grant reviewer for this organization and for numerous others in the U.S. Office of Education and so on. What it comes down to is that we need more -- and I don't know if Connecticut is different than other states, but I know in Connecticut, that's

all I can speak about -- is that we need more resources so staff can work more closely with the groups statewide to not only put together good proposals, but then to monitor those organizations so that, indeed, is what happens. That's my message. Thank you very much.

MS. VAN der VEER: Thank you. Thank you for your brevity. Next up is Molly.

MS. BALDWIN: Hi. Thank you for allowing me to speak. My name is Molly Baldwin. I'm the executive director of Roca, Incorporated in Chelsea, Revere, East Boston, and Lynn, Massachusetts, and we run what you all consider a high-risk youth corps for young people, and I would like particularly to speak about how these rules affect organizations and will affect churches who want to serve young people in low-income communities who are struggling with issues, so that service doesn't become a middle-class or an upper-class issue but is across all people.

In our community, briefly, we look at homeland security as people knowing each other, promoting and embracing diversity, promoting conflict resolution and peacemaking, and bringing people together. Young people do an enormous amount of public safety work with their peers and younger people, a huge amount of health outreach so people sort of feel better which there's no other funds doing that in our community. They run a food pantry in two of the communities, and are working with the city to diversify the cert. response teams.

Three sort of specific areas I'd like to speak about. One is it would be my hope someday that the Corporation gather some people specifically to talk about how the Corporation impacts high-risk youth corps. It's a discussion that's happened for the better part of 15, 16 years, but would it be possible to have a deliberate discussion on how all the rules impact those corps so, in fact, poor and low-income people can participate?

Particularly looking at some issues around young mothers and unrealistic daycare plans, the fact that in some communities, if you bring young people in who you might not be sure can make it, and they leave, it would be enormously helpful to be able to replace them so you could get the service done that's needed and to look at the healthcare issues.

Regarding the matter of changing a recipient of AmeriCorps grants, I think anybody who runs an organization knows it takes you three years to learn how to do anything, and then you're supposed to get better every single year, and so I would be very nervous, and it would certainly impact people doing this work in very challenging places that no sooner are you ready to go, then you have to stop.

Finally, under sustainability, I have a couple of thoughts. I mean, it's interesting to keep listening to not only the Corporation but everyone talk about how do you do more with less when no one wants to fund administration, and you have an enormous amount of paperwork requirements. It's almost absurd, quite honestly, from a community-based perspective and others that you want us to do more with less, but you don't want to fund the part that no one else wants to fund, so it makes it hard to do that.

The second thing is around matches and revenues. It's just really hard to raise money anywhere, and so I think again talking with us realistically about how that happens in different venues and from different perspectives would be helpful. Thank you.

MS. VAN der VEER: Thank you, Molly. Karley.

MS. AUSIELLO: I'm going to read as well just to stay on task. Good morning. Thank you so much for this opportunity to participate in this important discussion. I've also submitted more complete testimony. My name is Karley Ausiello, and I'm the associate director of Massachusetts Campus Compact, a statewide organization of college presidents committed to civic engagement as a critical component of higher education.

Nationally, Campus Compact is a membership organization of over 850 colleges and universities dedicated to fulfilling the civic mission of higher ed. Kind of an aside, I'm also an AmeriCorps alum. Our minimum time AmeriCorps Ed. Award program has proven to be an extremely valuable tool for colleges to open access, to encourage greater student commitment to public service, to develop students as civic leaders, to meet local community needs in ongoing and strategic ways.

Today I'm going to try to touch on three issues, sustainability, federal share, and the timing of the grant cycle. So sustainability has three points. The first is the AmeriCorps partnership with higher ed. has built-in sustainability measures due to the resources available on college campuses and in local communities.

Community agencies volunteer their time as supervisors and trainers, and allow AmeriCorps programs to leverage significant private and higher ed. resources. I think the federal work-study program is a really great example of that. Many of our AmeriCorps members are also community service federal work-study students, so that a community organization that receives this type of AmeriCorps member can continue to receive that federal work-study spot after the AmeriCorps position is gone. Also, we try to educate our community organizations about service learning, internships, community-based research, all the other things that higher ed. has to offer.

The second thing is the Corporation, in regard to limiting the number of years which a program can receive funding, we feel that as an intermediary organization with 63 member campuses and thousands of distinct service programs, we change our portfolio every three years, so for us to limit an intermediate organization is really hurtful. Every year, we work with our members to insure that we reach new populations of students, and find it more effective to help us change our portfolio than to limit us as well.

One of the most powerful services that our Ed. award program provides is volunteer generation. Our members recruit hundreds of college volunteers who participate in a range of activities, and then they serve alongside those recruits. A lot of times, that relationship between direct and indirect service becomes blurred, and AmeriCorps programs need the ability to navigate the distinction on a case-by-case basis.

In regard to the federal share, we feel that decreasing the amount of federal funds over time would not be the most effective method for program sustainability. The statute suggests providing strong technical assistance and providing development training to programs over a specific sustainability issue to consider it as a sustainability continuum.

Then lastly, the timing of the grant cycle. For AmeriCorps programs to succeed at higher ed. institutions, you need to follow the academic cycle, which means that for a September start date, we need to really know about the program and if it's going to be happening in early spring. If we start late in September, we lose a lot of our members to other programs. I'm going to stop there. Thank you very much.

MS. VAN der VEER: Wow. I'm going to thank this panel for doing a terrific job with the three-minute limit. Rosie and David, do you have any questions?

MR. EISNER: Molly, I've heard from several youth boards and also from other programs that bring in more high-risk youth that there's a challenge because the Corporation measures -- one of the measures of effectiveness that we use is completion, and so we're sort of encouraging programs to find youths that are less high risk which is a problem.

At the same time, we also know that for other programs, completion is actually a pretty good measure of whether they are serving the needs of their AmeriCorps members, and the programs that serve the needs of AmeriCorps members better end up with higher completion rates than the programs that don't. I'm wondering if you have any ideas on the right way for us to treat completion?

MS. BALDWIN: I'll try to say three things that are helpful. I think the opportunity for service not to be just for people who are already pretty squared away in their life is really important for the country, and in order to do that, you have to find another measurement because sometimes people think they're ready, and they might not be, and that there might be a way to work with some programs on what are we doing if someone is not completing it, what else are we doing to help them.

In our organization, if someone doesn't complete, sometimes it's for very compelling reasons. There has been childcare at times, there's been homelessness at times, and sometimes people just aren't ready. We'll find other ways to help them, so that might be a way.

Then I think it's important to -- I think it's a youth development matter, actually. I think there might be a way to look at accountability and how programs serve those needs around some core areas of youth and personal development to see how we're serving the needs of members. We've also had some members who maybe don't succeed the first year but will come back and do much better because they're readier, and I think that's really important as well.

MR. EISNER: Thank you. Karley, you note that you change your portfolio every three years. Explain what that means.

MS. AUSIELLO: Essentially, we have a 300-member AmeriCorps focus, so every three years -- well, we've only been -- this is the start of our second three-year cycle, so what we do is we put out a call for slot requests from colleges, and we ask that colleges stay in it for three years, and then, because we can't reach all of our campuses, that we choose a new portfolio of all different colleges for the second three years. That's essentially how we work it. The idea is that, I mean, we'd love to be able to help everyone, but we try to get our resources out as much as possible.

MR. EISNER: Do you think that there's a strategic difference between -- I don't think anyone's contemplating the Corporation on a three-year cycle, but the concept of we don't have enough slots to give everyone for a lot of folks to have opportunities for the program, should we be considering the same kind of methods for insuring that a lot of people have opportunities in those slots?

MS. AUSIELLO: I don't think so. I think one of the things that we do that I didn't talk about here is we also have a VISTA program, and we have Learn and Serve funding for many, many years, so we really see what we're doing as kind of a layering effect, so that we start with one program, we move to a different one, we kind of layer things in so that it kind of -- we see it as a long process for our folks. You know, that's something that I would suggest, that I think that there's lots of different portfolios that can kind of weave in together, and that these are the things that need to be decided on with each different grantee.

MS. VAN der VEER: Any other questions? Rosie?

MS. MAUK: Bob, as somebody who recognizes the importance that commissioners can play on a commission, I just want to sort of publicly say to everybody here as part of the commission to make sure that you continue to use the resources of commissioners like Bob. We know how understaffed our commissions are, and we hope in rulemaking, I hope you read it in to some of what we are sending as objectives, that we will be able to figure out a way to reduce paperwork and give more support in training and technical assistance to the commission staff, and that also, you know, we try to lend support so that commissioners also are as informed and engaged in this, and I know you obviously see yourself as a partner with the staff at the commissions, so thank you, and I hope that --

MR. RUE: I might write off some written testimony point by point, number one; and number two, I hope you would consider the three-year cycle of the Higher Education Act with all the institutions, strengthening institutions. It has done very well with that model. It gives people a chance to plan thoughtfully and evaluate more thoughtfully, so I know you say you've written it off, but I hope you'll reconsider it. Thank you very much.

MS. VAN der VEER: Thank you to this panel, Molly and Karley. Now next up is Darlene, Terri, and Bruce, speaking in that order, and then on deck, I need Susan Spinell, Lisa Ulrich, and Nicole Boothman Shepard. So if I could have those three individuals down here in front. Darlene, you're up. Three minutes, please.

MS. JOHNSON-MORRIS: My name is Darlene Johnson-Morris, and I am the manager of Barnstable County Resource Development Office and a director of the AmeriCorps Cape Cod program, and I have -- I was thinking about this last night, yesterday with the staff, everybody, and with the state commission, and I wrote all this up, but then I'm writing all of this, and I thought about your question.

Michelle, one of the staff of our AmeriCorps programs, said we're not answering the questions about how can we reduce costs. She's asked that about three times. So I'm sitting there thinking how can we reduce the costs, and I was thinking that one of the things that I see, we've been in existence since 1999, and that was an incredible year, that startup year. It took so much from everyone.

But one of the things that convinced the community that this could happen was the money and the AmeriCorps and the whole idea of that, and I thought to myself what was happening last year was so hard to watch what was happening at the national level with the Corporation, and trying to put a value on that trust. The community's asking me and looking at the commission, and our commission is so strong and so helpful, and saying what is the price of that when the communities are asking what's going to

happen? Is AmeriCorps going to be here? I think AmeriCorps is not going to be here anymore.

I think that's very expensive to the community, to the programs, to everyone when we just figured out where, you know, to make ends meet, and then the ends are changed, so I think a clear and consistent -- oh, gee, did that go fast -- partnership between the Corporation and the commission and the programs, and that message is clear, and it's not changed all the time where we feel like there's instability because we really are on the same team.

I mean, that's one of the things I think that could reduce the cost, you know, that we do sustain programs that are good, that we give them a chance to have three-year grants and to do what they do, and to prove it to you, and when you can prove it and we can prove it and the commissions are given that chance, I think that that's what's going to make the difference. So I won't read this because that's what I think will reduce the cost.

MR. EISNER: Will you please submit it into the record, so that we can read it?

MS. JOHNSON-MORRIS: Yes.

MR. EISNER: Thank you.

MS. VAN der VEER: Thank you, Darlene. Terri, you're next.

MS. SULLIVAN: Hi. My name is Terri Sullivan. I'm a certified family nurse-practitioner, and I've been the director of the Taunton Student Health Corps since 1997. Morton Hospital and Medical Center piloted the program with the support of State Senator Mark Paccheco in an effort to improve access to healthcare for the uninsured and underinsured residents of Greater Taunton, Massachusetts.

This AmeriCorps program recruits and trains health professional students to provide health education and screening to under-served populations in community-based sites. We're a professional corps. Morton Hospital has demonstrated its commitment to this program by contributing 1.3 million dollars in matching funds since 1997.

The entire Taunton community has come to rely on its dependable community service because it fills the gap in otherwise unmet basic human needs. The healthcare climate continues to be challenging for health institutions and consumers alike, and the need for the Taunton Student Health Corps has become even greater than ever before. It's taken many years to strengthen our relationships with the community partners and to effectively change some basic healthcare delivery models and to improve health outcomes for the community as a whole.

That is why I believe the Corporation should not limit the number of years for which a program may receive funding, and that the Corporation should not calibrate sustainability requirements to reflect differences among programs such as time and operation or mission.

As a professional corps, we are sometimes challenged to meet the new guidelines of volunteer recruitment and civic curriculum. Our members are in school full-time for the

most part and participate in part-time individual placement models. It's not feasible nor would it be possible for members to meet their service learning goals and increase professional and technical capabilities while also recruiting volunteers, fund-raising, and doing other capacity-building activities.

If these rules are enacted, valuable time needed to fulfill our core mission of meeting the needs of uninsured populations that we promise to serve would be wasted on these new mandates. The heart and soul of AmeriCorps is meeting community needs defined by the community, not by the government. The criteria that the Corporation uses in selecting programs is appropriate. However, I believe that the Corporation should continue to include professional corps as grantees especially in healthcare.

The healthcare sector has always been in that other human needs category and is less represented. We have a healthcare crisis in this country, and any federal dollars that can be designated in this room are desperately needed. Hospitals especially are suffering from limited reimbursement from health insurance companies and increasing cuts in uncomplicated care.

As more companies are forced to lay off employees, reduce health insurance benefits, or increase employees' contributions, the ranks of the uninsured continue to grow. Federal support is critical to the survival of important healthcare programs like the Taunton Student Health Corps. Every dollar cut from program support means less help to those hard-to-reach individuals. Increasing match requirements could potentially eliminate the possibility that programs like ours will continue. Thank you.

MS. VAN der VEER: Thank you, Terri. Okay, Bruce, you're next.

MR. SPEIGHT: First of all, thank you for the opportunity to comment. My name is Bruce Speight. I'm the program director of Massachusetts Community Water Watch, a project of MASPIRG and the Mass. Service Alliance. I wanted to take this opportunity to address two of the rules which are being discussed here today, the federal share costs and private match for grants, and performance measures and how they relate specifically to environmental programs.

First let me say a couple of quick words about my program so that you know where I'm coming from. Water Watch works to restore water quality by engaging college students and community volunteers in river cleanups, environmental education programs, and streamlining projects. We're based in ten urban communities across Massachusetts on college campuses where we focus on giving students the skills and tools to protect their local water resources through engaging them in action, hands-on service, and education projects.

We've been an AmeriCorps program up through last year. We lost AmeriCorps funding for this year, but have sustained our programs thanks only to a state service grant and the support of the Mass. Service Alliance. We're hoping to restore our AmeriCorps funding for the upcoming program year.

With 16 corps members, we're a small program. We fund the program with service grants, regional and community foundation funding, and local community support. At this point, we are dependent on an AmeriCorps or similar grant to run the program, and even with this funding, we've been limited as to what we're able to support as a program.

Of course, we'd love to do more to educate communities about their natural resources and what community members can do to protect them with more resources, but right now, our core expenses are increasingly difficult to cover, and there would be a very negative impact on our program output by increasing matching requirements.

For example, an increase in match means more of my time fund-raising and less time with corps members, site partners, and on program development. As a result, our member training suffers, our member experience suffers, and our impact in communities suffers. Also, as the amount available for operating expenses decreases, programs such as mine are left choosing between staffing, service supplies, and phone use.

As the Corporation seeks a greater match from smaller programs such as mine, it not only means that we are able to do less, but it also puts a very tight squeeze on our resources and our ability to run a successful program. As we do not see corporate sponsorship, a move to a greater match will only hinder my program's ability to continue to contribute to communities across Massachusetts into the larger service community.

Even though foundation support has helped us to secure the match in order to run an AmeriCorps program, it simply will not be sufficient to allow us to run a program if we remain the same size while also being required to provide more matching funding.

Secondly, I'd quickly like to comment on the recent changes in performance measures as they relate to environmental programs. First I'd like to say that environmental programs address very critical needs in our communities and are a particularly effective issue around which to engage volunteers civically. However, I do not believe that the current performance measures accurately and sufficiently demonstrate the impact of environmental programs.

For example, the program that works to restore water quality, we cannot quantify the end outcome of our work by saying that water quality will improve by a certain percentage. It is difficult within a year or even a three-year period of time to quantify the environmental impact of our work. Often, the impact of environmental work is seen over a longer period of time like 10, 15, or more years.

I understand the importance of demonstrating impact and am excited to work with the Corporation to figure this out, but until we do, it seems unreasonable to expect the environmental programs to produce quantifiable end outcomes in three years. Thanks again for this time.

MS. VAN der VEER: Again, thank you, Darlene, Terri, and Bruce. Rosie and David, any questions for this group?

MR. EISNER: I guess I've threatened to do this, so now I will. Terri, I appreciate the rules that you don't want us to enact. Could you articulate what you would like us to do?

MS. SULLIVAN: Yes. I got the red light right when I was about to say some things. I think a three-year cycle should be a three-year cycle. This every-year business is so much work for the commission. They're less staffed than ever before, and there's so much work for us. You know, we have to interrupt what we're doing to start the cycle all over again. I think it wastes a lot of time.

Secondly, I think administratively, there's so much work, there's so much paperwork, there's so much accounting work, that, as people have said before, it doesn't get compensated for. It comes out of our own company, and if there was any way to decrease the amount of administrative work, I think that would also help things as well. I think those are the main things.

MR. EISNER: Thank you for those suggestions. What about on the cost issues where, by statute, Congress has asked us to reduce the federal share, the federal cost to programs; how should we accomplish that?

MS. SULLIVAN: I think again, as other people have said, you can't just look at money in terms of sustainability. There's a lot of in-kind donations in terms of people's time and office space and telephone time. All these things really add up to make the program successful, and I think that money, and time is also money, and I don't think those things are weighted as heavily as they should be.

MR. EISNER: I don't understand what the suggestion is. What's your suggestion for accomplishing that?

MS. SULLIVAN: Well, I think that we need to have more credit in terms of the in-kind contribution. They're always looking for a cash match, and all these other things really add up in terms of time and space and phone and everything else. Give us credit for our in-kind as much as you would with cash.

MR. EISNER: Thank you. Bruce, if I gave you two facts that the vast majority of programs exceed the match, cash match, and that somewhere between 25 and 30 percent programs currently double the cash match, which means that there are a lot of programs that are in different situations than you're in where that kind of matching requirement is very hindering, how would you -- do you think there's a way for me to take that information to the Corporation, take that information and find a way to increase a matching requirement?

MR. SPEIGHT: I think from my experience in Massachusetts, I think this is more of a challenge for the smaller programs like my program, and particularly for programs that work in the more rural communities, leveraging more -- or matching funding for the work we're doing in the communities is difficult. Like Bob Coates was saying earlier, the Student Conservation Association, communities like Pittsfield, Massachusetts, Worcester, New Bedford, Fall River, we work to go to a lot of support for our program, but the resources are just fewer than in larger communities like Boston.

It's challenging for smaller programs to find that match, so that's the position that we're in. I think we work quite hard. I know as a program director, I put a lot of time and energy into finding more matching funds for the work that we're doing across the state, but a lot of communities are already strapped and can't fund the work that they're already doing, so there we are. I think there are some communities that need AmeriCorps programs desperately.

MR. EISNER: Thank you.

MS. MAUK: I'm going to pass on asking questions of this panel, and I'd just like to take a moment because I'm afraid they're going to leave, to just say hello and recognize the

AmeriCorps members who are in the room this morning and this afternoon as part of when we talk about building a civil society and participating and watching a process, and David and I appreciate the fact that whoever had the foresight to have you come and observe this process, we appreciate it.

MS. VAN der VEER: Yes. Here we are, democracy in action, and to get right on with democracy in action, I'd like Susan, Lisa, and Nicole to come up to the table, and on deck then I need Kristen McSwain who I see is already in the front row, and Meg Kennedy Dugan. That's the third person in the next panel on deck. So Kristen, Nicole, and Meg are up, and we'll start with Susan.

MS. SPINELL: Hello. I'm Susan Spinell, the director of the Maine Conservation Corps. We are an environmental education and field team program in Maine. Through 2003, we were an AmeriCorps sub-grantee, and we no longer are. We've been part of state government and a program running in Maine for 20 years. We've consistently operated the largest program in Maine averaging 60 to 70 FTEs per year.

We recognize that there are many ways to view sustainability, and while we have been temporarily sustained without AmeriCorps funds, it has come at a great cost. Many of our partners who are mostly the smaller non-profits cannot afford the increased prices we have been forced to charge in order to stay in business. These are the same small non-profits that use AmeriCorps members to build their capacity, and it becomes a stronger organization.

As a state agency under the Department of Labor and not a 501C3, we are unable to submit many applications for most grants. As previously noted by many others in this room and across the country, the wealth of private funds has indeed shrunk at an alarming rate. We also must compete against our partners for those very same funds in order to survive. We've consistently brought to the table close to \$500,000 in cash for our programs which, I will admit, are fairly expensive to run. I would consider the sustainability a reason to continue a strong program in Maine.

I'd just like to point out, in listening to what everybody's been saying, I think one of the things that gets overlooked when we talk about everything up here, that this is a people program, and I think you have to recognize that people programs are expensive to fund, and that when the full-time year-round AmeriCorps members who's got an environmental education goes into a small non-profit to build volunteer bases and capacity and to help that agency grow that's getting volunteers involved in doing their mission, that they're getting a 30,000-dollar person for a very small cost share. I think that's something to kind of keep in mind when you were talking at larger levels that at the very people level, there's a benefit.

My community development background level just makes me kind of crazy when I listen to this issue of sustainability because, maybe this is not the way to look at it, but this funding is attached to the HUD VA bill, and traditionally HUD programs with community development block grant funds can be funded forever because they are monitored and doing the things in the community, and these are programs that people want to exist. If they're not doing a good job, then they don't get their money. I think if you want programs across the country, you need to fund them.

I would like to close with a question for the panel. I don't know if you're able to answer this at this point, but I would like to know if the Corporation has done any research or

evaluation on the impact of the AmeriCorps reduction and how that's affected communities with programs that have had to shut their doors.

MS. VAN der VEER: We'll respond to that at the end. We'll go on now and hear from Lisa.

MS. ULRICH: I'm Lisa Ulrich. I'm the director of the National Teaching Fellows Program at Citizens Schools. I can tell you my heart is literally beating with excitement at the chance to share with you who we are and what direction we hope this rulemaking takes.

Citizens Schools is a nationally recognized out-of-school time initiative that uses hands-on experiential learning and community building apprenticeships to promote the academic and the leadership development of urban children. This is our tenth birthday, just like you, and we've grown from a single Boston site that served 20 children to a national initiative, and that's now 12 cities across the country serving 1800 children and engaging nearly 2,000 volunteers annually, and they're actually, on average, giving 30 hours each yearly.

With your support, we plan to continue this expansion, and we envision a day when most of the nation's 88,000 schools reopen after school, on weekends, and in the summers for experiential learning opportunities to prepare our youth to be successful 21st Century workers, community builders, and, most importantly, citizens.

AmeriCorps has been a critical foundation for the realization of our plan and our vision because it allows us to sustain an essential component of our organization, the teaching fellows, who are the front-line educators, team leaders, and community organizers, and we believe the future leaders of the after-school field.

Based on our experience and our plans, our ambitious plans, we have three primary suggestions for you. First is we would like to ask that you take a performance-driven approach and continue to fund organizations that are meeting their goals and mission.

Our evaluation results show that our learning model is working. It's putting students on the track to success. Our Citizens School students have a higher rate of attendance, they have better and more positive relationships with their staff and their peers, and they're more actively engaged as learners both during the program and afterwards than their peers. So just as investors in the private sector continue to reward innovative and successful companies, we ask that you focus your grant-making process on selecting organizations with proven track records.

I'm going to condense my second two recommendations. The first is that we hope you extend enrollment in education requirements for current members so that they can continue to develop as strong leaders in the out-of-school time field. The bottom line is we believe some of our best people are AmeriCorps graduates, and we, as kind of a professional corps, are seeking to develop leaders, and we'd like you to extend eligibility to third and fourth-year people within the stream.

Lastly, we, like any other programs you've heard, work with schools on an academic year cycle, and we'd like to be both informed and able to enlist and train our members to begin in the summer. One last thing I want to add, because you've been sort of barraged with how are we going to fund this, so let me give you two quick thoughts.

One is I think the more you can be coordinating with other government initiatives like 21st Century Community Learning Center work and really looking at our missions and how you can leverage some of their money for AmeriCorps, the better.

Secondly, I also think that foundations represent -- while we can work with them individually, we think that you as a Corporation with the mission of galvanizing young people can really be tapping some of the funds that they're not releasing for this really important work. Thank you very much for the opportunity to help to shape your future and our future.

MS. VAN der VEER: Thank you, Lisa. Nicole, please.

MS. BOOTHMAN-SHEPARD. Hi. I'm Nicole Boothman-Shepard. I'm with the state commission in Rhode Island, and don't be offended, but I'm going to look at my notes so I can get through them. In reference to that 04 consolidated appropriations conference report which requires the Corporation to develop a definition of sustainability, the VA HUD conference called for aggressive measures to comply with the letter and spirit of the law on sustainability.

The entrepreneurial spirit of AmeriCorps informs my recommendations about it, and the time that -- I won't speak to the time necessary to build deeply impactful programs. The frame of reference that I have and bring from my state commission is that we'd love AmeriCorps not to be fluid. We'd love it to be fixed federal funding, but we can't rely on that because we can't predict what Congress is going to do. So our ability to capture and sustain and maximize the impact that AmeriCorps National Service has on communities in a lasting way will be the way we define our success taking a long view.

I've been with AmeriCorps since '94, and what I recommend is based on what I've seen to be effective on the ground. In terms of defining sustainability, I ask the question. How does AmeriCorps improve the quality of life for people in distressed communities, and I think AmeriCorps needs to answer that. I say that coming from Providence where many of our programs are, which is now the third poorest city in the country.

The Corporation asks grantees when they define sustainability how does AmeriCorps help grantee organizations build infrastructure to manage finances effectively, so that they're poised for growth beyond national service dollars? How does AmeriCorps seed grants to effectively evaluate impactful programming? Do grantees evaluation of programs go beyond the AmeriCorps activities? In other words, do they learn how to do evaluation in AmeriCorps, and then say, boy, now we need to evaluate all our programs, and they bring that to light throughout their agency?

How does AmeriCorps enhance an agency's ability to approach its work in an intentional manner? Is AmeriCorps encouraging grantee organizations to use strategic planning and other intentional planning practices as they develop how they bring their missions to life in the community? I've seen that AmeriCorps does that, and we can measure that.

How does AmeriCorps build partnerships among community organizations with different scale or a different orientation to facilitate -- how do those partnerships expand beyond AmeriCorps because that's what we see. The partnerships get seeded through AmeriCorps, and then they expand beyond AmeriCorps, and if AmeriCorps left that grantee organization, the legacy would be that those agencies would continue to partner together.

How does AmeriCorps teach non-profits to evaluate community need and the statewide indicators of need? How does AmeriCorps handle the funds and have the ability of non-profit practitioners to serve the community well? I think the place that we can measure this are in the community strengthening performance measures. That's a place where we can talk about the sustainability, and we can ask grantees to articulate their goals in that manner, so we're not only looking at the standard, we're looking in terms of dollars.

I also want to speak quickly to timing out. Elizabeth Cady Stanton said the only program we have to stand on is the truth, and today now, AmeriCorps helps individual members succeed in adverse circumstances. AmeriCorps doesn't propagate systemic change. We're looking at our feet, not on the horizon. We want to be looking at the horizon, but we're not. We're not able to today, and an initiative -- right now, AmeriCorps program staff and members are fishing, in our case in Rhode Island, kids out of the river. We're not fixing the bridge.

Until AmeriCorps creates systemic change and transforms how districts work in communities, for example, school districts work in communities, the need is going to continue, so to cut out an effective program off at year ten doesn't help us capture the fact that is still recurrent. Thank you.

MS. VAN der VEER: Thank you, Nicole. And I just want to say David and Rosie, as you begin to think about questioning this panel, that we've got three more panels, and if we're going to get through all three of them, we need to move on. Thank you, all. Kristen, Meg, and Kelly. Is Kelly here? Okay. Come on up. Then I would like to have Gretchen Glaub, Dorothy Stoneman, and Imari Paris Jeffries. The three of you are now on deck. Kristen.

MS. McSWAIN: Good morning. As an executive director of a state commission, I have a great deal to say on all of these topics, but since you gave me a minute per topic, I'm going to give you three. One is timing of the grants, sustainability, and performance measures. In terms of timing of the grants, I'm assuming that we aren't going to allow programs to have pre-award costs before they have their award given.

So based on that, our programs that begin at the school year absolutely have to know when they're going to be funded by June 1, because if they don't, they can't recruit their corps, they can't train them, they can't continue to have their partnerships with schools. What that means as a commission is that I need to have that award by June 1.

Prior to that, prior to the work that you all have to do, and I don't know how long you think that's going to take, but we could run a process in four months, and it would be a process that did not set up communities to understand AmeriCorps, to receive any technical assistance, or to have the time to plan, find their match, and create partnerships to implement the proposed programs should they actually be funded.

In order to run a really good process that allows us to touch base with small faith-based organizations, community-based organizations, we need five to six months, and that is from the time the guidance is issued until the time that those proposals are due to the Corporation. So that's kind of my parameters, and that's informed by conversations with other state commissions in terms of timing of the grants.

In terms of sustainability, you know, the Corporation's rules about sustainability say a great deal about us to the communities that engage in service and volunteering. Do we

value small community-based organizations that are meeting critical needs on the ground? We say we do, but if we define sustainability solely as a dollar match, we are not showing that to communities.

So I would say that what we should come up with together is a matrix of criteria for measuring sustainability, and then to allow commissions and other -- you know, you guys are doing it with National Directs or whatever else -- to set reasonable targets in each area based on economic and philanthropic factors of, in my case, my state.

So I would say that the matrix could include the following. Your ability to raise the cash match for a member stipend of 15 percent; ability to raise and document in-kind contribution, cash and in-kind, 33 percent of the whole; additional cash of in-kind resources raised beyond the required match. The problem is if you make them required match, then they're subject to the I.G. audit, and everybody's afraid to report on that, quite frankly, because they know what it means to have the inspector general come in and say I'm sorry, you don't have the correct piece of paper for that, and now you haven't matched the match you said you were going to do even though all you're really statutorily required to meet is 33 percent.

Number four in the matrix would be expanding the volunteer base, and the measurement of that, which you get in your performance measures; program expansion, which could be defined as new sites or increased service recipients; increased community awareness either for a program or for the issues that that program is addressing; the ability to meet or exceed performance goals established in performance measure including the spinoff of AmeriCorps-initiated projects, and notice I say projects and not programs; and then the documented support from oversight committees or community advisory boards that really say this program is imbedded in our community, and here is the proof that says that. So that is kind of the matrix that we could look at.

In terms of performance measures, the thing that I would say about that is I think in the past, you know, we have taken a step in the right direction. There is plenty of research that says you cannot have an end outcome in three years, and we're requiring them in one year from our programs, and so do we set ourselves up for watered-down measures that are confusing and that don't actually have authentic outcomes when we ask for them in one year. So I would propose that perhaps we could up them in three years, if at all. Thank you.

MS. VAN der VEER: Thank you, Kristen. Meg, you're next.

MS. KENNEDY-DUGAN: Thank you for allowing us to speak today. I'd like to speak from a grantee perspective and about the one issue that, to my board and staff and members, is of the greatest concern which has to do with sustainability. My name is Meg Kennedy-Dugan, and I'm the program director of the AmeriCorps Victim Assistance Program, also known as AVAP. AVAP began in 1994 and was one of the first AmeriCorps programs in New Hampshire. Our program derives new AmeriCorps members from across the country because it's one of only a handful of similar AmeriCorps programs in the country. People who want to serve their country by assisting victims of domestic and sexual violence can do so by becoming an AVAP member.

Since AVAP began, our members have assisted over 32,000 victims in New Hampshire. Victims have been women, men, and children who have experienced devastating abuse

and violence in their lives. Our members have helped these people to work towards escaping that violence. Every year, we receive feedback from those victims telling us that without the assistance of our AmeriCorps members, they wouldn't have had the courage or the knowledge to be able to escape not only themselves but their families from that violence.

Concerning sustainability, it's essential that how long a program has existed is not the sole consideration. The community needs, the quality of the AmeriCorps program, the amount of community partnerships involved, as well as community involvement are all key factors in evaluating sustainability. If programs are to be punished financially simply based on how long they've been around and when programs are accepted no matter how well they meet the urgent local community needs, the Corporation will be weakening the AmeriCorps program and its goal of serving our country's needs.

In New Hampshire, particularly in rural New Hampshire, there are limited sources of funding as you've heard that from other speakers this morning. What local funding resources there are are almost always being tapped by similar organizations, and AmeriCorps programs, as they would pursue these dollars, would be competing with community partners for extremely limited funds.

This part of the country simply doesn't have the resources to be able to financially support the AmeriCorps programs. In order to truly provide for this country's community needs, it's essential that the Corporation look at many factors when deciding how to fund the programs. The program's proven track record that meets the state's greatest community needs, location of the program, and therefore other possible avenues for alternative funding, and the ability of a program to recruit members both from within their local area and nationwide should all be taken into consideration. Seeing as I see the yellow light, I'd like to just submit the rest of this in written form. Thank you.

MS. VAN der VEER: Thank you. Kelly.

MS. NEVINS: My name is Kelly Nevins, and I'm the executive director of the Volunteer Center of Rhode Island. I'm also here in my capacity as a council member for the Volunteers International Network and representing New England Volunteer Centers. I can only hope to be as eloquent as my predecessors, and some of this will be redundant, but I think it's important to emphasize.

From the different groups that I represent, one of the things that we would advocate for and it has been mentioned previously is lowering the cash match, the federal requirement, and including more in-kind matching as going towards the requirements. This would allow smaller and faith-based organizations to compete for grants where they can't currently.

Secondly, with regard to sustainability and building capacity of non-profits, we would advocate for using AmeriCorps members more in a fund-raising capacity and capacity-building within the organization in addition to the direct service that they currently do, using them more as time goes on to enable these organizations to be able to sustain those programs once those AmeriCorps members leave. Also, it would be helping to create more marketable skills for AmeriCorps members once they leave the AmeriCorps program would be a huge career option currently in our country.

Thirdly, to provide higher levels of technical assistance to AmeriCorps programs. There are some really good basic training that's in place right now, but what I've seen from my own personal experience is that there's more need for the intermediate and leading into expert training for people who've been in AmeriCorps beyond the first year. Again, this, I think, would help to build the capacity in the organizations that they're serving in and quite possibly build back sustainability.

A final thought is that I personally have noted a lot of duplication in terms of things that are happening on the national level by different organizations, and I would encourage the Corporation in whatever capacity it can to collaborate with other groups such as United Way of America, the Points of Light Foundation, et cetera, et cetera. If you were going to be doing the same sorts of programs, let's see if we can cut costs, work on performance measurements together, so that more programs can save some money and also be measuring the same types of things. Thank you.

MS. VAN der VEER: Thank you, Kelly. Are there any questions for Kristen, Meg, and Kelly? I know, David, you're pushing your 12:30 deadline.

MR. EISNER: Just one thing, Kristen. Those are some really good and thoughtful solutions. Thank you. Also, Kelly, I appreciate your point of view overall on things that we need within our community. I appreciate that you were talking about the greater partnership. We also need to be focused more on the volunteer centers in general. Sometimes we have a hard time bringing commissions and the state offices together for the purpose of planning and coordinating with the state. I think when they come together, we can really do a better job of bringing the volunteer centers into that planning, so I'm particularly appreciative of your bringing that up.

MS. VAN der VEER: Rosie, anything? Okay. Thank you to this panel, and Gretchen, Dorothy, and Imari, I'll have you up here at the table, please, and Mary Carchire and Kevin Burke. Are you here? Okay. Come on up front, and Kevin Burke, are you here? Can you please come on up front because you'll be the next panel after this one.

MR. EISNER: I've left myself unfortunately too little time to stay here, but I want to thank everyone so much. I'm going to be reading the rest of the testimony and talking with Rosie. Thanks very much. I apologize for leaving early.

MS. VAN der VEER: Gretchen, you're up.

MS. GLAUB: My name is Gretchen Glaub, and I come here representing two hats. I'm the program coordinator for Barnstable County AmeriCorps, but I'm also here as an AmeriCorps alum. From my conversations with Rosie last year in Baltimore, and also after listening to David and you speak at the conference in February, I just really would like to considerably thank you for talking straight with us, and for engaging in real conversations with the folks in the field, and I really welcome this opportunity.

I'm proud of my two years of service, not only because of the contributions to the local community, but also to my connection and my contribution to the National Service Movement. I think the National Service Movement has grown in amazing strength the inception of AmeriCorps, and it's motivated as far as myself and thousands of others.

In the tradition of the Civilian Conservation Corps and in the spirit of our country's connection and identity associated with our national areas, and also the recognition of environmental needs throughout the country, I believe the environment should be seen as one of the five focus areas of AmeriCorps. Furthermore, I believe that the five focus areas should each be adequately represented in the national AmeriCorps portfolio.

Kind of jumping into my AmeriCorps status, I'm here to say that I actually like the idea behind the performance measurement evaluation, and I think that I guess a way to save time and money is to kind of stop changing the game and work with the model that we have.

But I'd also like to say that as an environmental program, I'd ask the Corporation to recognize that the performance measurement model as it currently exists includes measurable outcomes on a short time scale, and uses humans as the primary beneficiaries. It makes it difficult for environmental programs to really demonstrate impacts, and also I think consequently, compete with other programs for grants.

So in my AmeriCorps alum shoes, I joined AmeriCorps in 1997, and I signed up to serve in a local community school and student Ed. award. At the time, I had no real connection or commitment to national service, but my experiences as an AmeriCorps member changed that, and that's why I'm still here.

By limiting funds for programs to nine years, you effectively remove the national from national service. By removing AmeriCorps funds from programs that have proven themselves to work and effectively recruit people such as myself to serve in the communities, you stifle the growth of the national service movement.

By removing AmeriCorps funds, you cut out the heart of the civic goals that the Corporation itself has set forth, and by removing AmeriCorps funds, the programs, members, and the volunteers that they have recruited lose part of their identity, part of their inspiration, and part of their motivation, and part of their connections in the national movement.

I don't believe AmeriCorps funds should arbitrarily be stopped at nine years. We don't have time to get into the whole arena of how losing AmeriCorps funds would affect small programs like mine on good old Cape Cod.

MS. VAN der VEER: Thank you, Gretchen. Dorothy.

MS. STONEMAN: I also want to thank you for this wonderful process. It wasn't necessary that you added it as an additional step, and it's really excellent testimony. I am a member of the Save AmeriCorps Coalition, and I support that testimony. A lot of wonderful things have been said this morning, and I'll try and say things that haven't been said.

Youth Build AmeriCorps programs are one in which low income young people, 90 percent of whom have dropped out of high school, get to build housing in their communities and go back when we build alternative schools to get their GED or high school diploma and get leadership training at the same time. There have been 3,900 Youth Build AmeriCorps members over the last ten years, and they have logged 3 million hours in community service.

I think it's been said, but I can't resist saying it myself, that eliminating experience and prior achievements as a factor for selecting, or worse, making it a negative factor for selection, or still worse, a prohibiting factor at a certain point in time would be profoundly counterproductive. It would be inefficient, and I believe it would be unjust as well as ultimately ludicrous to do that.

I also think that making an automatic increase in private match required would be counterproductive and would do what previous speakers said which is it would be to force the most entrepreneurial leaders in small community-based organizations to spend an inordinate amount of time looking for the dollars instead of expanding services and enhancing them.

I do think, however, that there is room for a kind of technical assistance and training for these leaders in how do you make the building of community support and gaining additional resources synergistic with the quality of your program because a lot of people don't really know how to do that, a few.

I have some suggestions about handling the private match. One, no distinction between member costs and program costs. I never understood how it's of value. Some calibration of local community capacity, certainly the rural issues in the small community-based organizations.

And here's something no one's said. I think you should consider a way to count as in-kind contribution the very wide gap between the salaries that people in community-based organizations make compared to what they would make in the private sector. There's a double standard for the non-profit and the for-profit sectors, and we get the short end, and we're giving so much that should be counted.

I would have no match for the capacity-building members. I think it's a revolutionary improvement that you're going to allow members to do capacity-building, but when we asked our applicants for a national direct program, if they wanted to have two capacity-building members, the answer was we can't afford the match. We can only afford one, and that's stretching it, and you have to help us raise the match.

So if we're really going to allow capacity-building, let's take off the match on that piece because they're going to be building capacity, count the match of the total costs, as a previous member said, up the 5 percent administrative limitation, it's not realistic. A key problem for us with low-income young people as members is this restriction on how you count the living allowance, that the idea that you can't give people less when they're absent is counterproductive for people who are learning work habits.

Finally, the administration of the Ed. awards only, we have part-time Ed. awards because our young people spend half their time in the Youth Build alternative school because they must. The costs of administering a part-time Ed. award is the same as a full-time award. Large numbers of our local programs don't even get Ed. awards because they don't have the management capacity.

MS. VAN der VEER: Dorothy, that's four minutes.

MS. STONEMAN: I know. I've got one more sentence. If you could give the full-time costs of management even for part-time Ed. awards, we could split it with the local programs. I'll tell you about tutors in my written comments.

MS. VAN der VEER: Thank you, Dorothy. Imari, three minutes, please.

MR. JEFFRIES: Good morning. My name is Imari Paris Jeffries, and I represent the Mass. Service Alliance. I am also an AmeriCorps alum as well as a former program director, so I come at this from many different angles. I think the two things that I'm going to talk about is qualifications and requirements for tutors, and some of these things have been repeated earlier by my colleagues, as well as performance measures and evaluation as much as I can talk about in three minutes.

Similar to the Corporation for National Service, many of the programs in Massachusetts are literacy-based programs. This year as well as last year's requirement, literacy-based programs had to have scientifically proven standards to implement literacy programs. Those include -- I'm just repeating this for those who don't know -- curricula, tutoring training, outcomes, and standards for tutors, and that's where most of my argument will weigh in.

I think as mentioned by my colleague from Maine, there's a tension between setting up standards for tutors while at the same time not having those set of standards for other areas of service such as healthcare, volunteer management, public safety, Youth Build programs, and other programs, so there's a tension of singling out one particular stream of service to have special standards.

I think a deeper level of tension arises when we invoke the No Child Left Behind acts, and I think if we overlay the No Child Left Behind act and try to implement AmeriCorps, there lies many challenges. I think I began by saying that there are two things, performance measurements and qualifications for tutors. There are some challenges between both of those, and that is timing and professionalization of service and volunteerism.

Overlaying the No Child Left Behind act over setting professional standards for tutors lies many challenges, and No Child Left Behind, there are certain items specified with teacher qualifications, the Reading First program, scientifically-based standards, and I think that those are some of the things that the AmeriCorps guidelines have mentioned.

To use a performance measure terminology, the purposes of these inputs is for adequate yearly progress, so each state has to measure adequate yearly progress using these standards. This adequate yearly progress is measured in the fourth, eighth, and tenth grade in most states through an assessment test. In Massachusetts, it's called the MCAS, and in Texas, your home state, it's called the TASC. So those are only done four times a year to measure adequate yearly progress, so to impose standards that are really inputs for a larger goal of measuring adequate yearly progress would cause a lot of challenges.

Ultimately, yearly progress is to measure the percentage of proficiency that each state has to succeed at under No Child Left Behind, so by the year 2013 and 2014, every school, every child in the United States has to measure proficient under No Child Left Behind, so that is a 12-year when this was first initiated difference between this and AmeriCorps.

These rules that AmeriCorps implemented last year with one year to implement these standards and No Child Left Behind give a 12, 13- year window in which these can be implemented, and there are definitely some challenges. I know that the red light went on, but I just have one more sentence just to tie in performance measures.

All it's to say is that there's a tension between trying to professionalize tutoring in AmeriCorps while at the same time trying to incorporate performance measures in a non-professionalized way. Our commission alone has spent six hours per grantee giving them rate for performance measures.

For the past two years, we've had 35 grantees and we've applied performance measure to training. That comes out to six weeks. Our commission has dedicated six weeks of our 12-month year implementing a rule change that was implemented last year which provided many challenges for our understaffed organization. Thank you.

MS. VAN der VEER: Thank you. Rosie, any questions for Gretchen and Dorothy and Imari? We have one more panel of two people on it, so if you look at the time, you can do the math.

MS. MAUK: Dorothy, thanks for your thoughts on how we at the Corporation should perhaps take some responsibility for working with our grantees and working on sustainability, and yesterday, one of our conference calls that David and I had was the field on rulemaking. Actually, some individuals from the grant-makers forum on national community service have offered to step forward and work with us on that.

We, too, are as challenged as our grantees are with the kind of dollar support we have to do some of these great ideas that you all have, so I guess I might just say to the audience that if you have some suggestions of other resources that we can use outside of the ones that we have, we would appreciate it. I mean, it's where we know we need to go, and so while I have an audience here, I would ask that of folks if you've got some other ideas of places where we can support that.

In regard to performance measurements, the same way. We all know that we've just -- the Corporation started instituting them this is now our second year, and it's tough, and at the moment, what we've asked of programs is that they self-identify what those outcomes will be, and so you have our commitment again that we will try to continue with as much resources as we have to support programs in working out performance measurements, and again, for those that have ideas or resources for other folks that could support the Corporation in doing that, we would, and I know Gretchen and her staff would appreciate that. Thanks very much.

MS. VAN der VEER: We have the final two speakers who self-identified in advance. Mary and Kevin, come on up, and we're going to be pushing 1:00, so those of you who are hoping to get a chance to speak without pre-signing up, I wouldn't count on it, okay? But I will tell you at the end of this meeting all the ways that you can be in dialogue with us without speaking at this particular meeting. So with that, Mary, you're first, and Kevin, you'll be our last speaker.

MS. CARCHIRE: Thank you very much. My name is Mary Carchire. I'm the director of the Senior Service Corps on Cape Cod which consists of both RSVP and AmeriCorps, and all of our AmeriCorps members are age 50 or older. Although my program is kind of

unique in that way, I think a lot of the problems that we have apply to all AmeriCorps programs, and so I've tried to emphasize the things we have in common.

I was asked by the Corporation to form this Senior AmeriCorps in 1999. After polling our RSVP members who were doing environmental service, we found that the best way to engage seniors in AmeriCorps would be as quarter time two-year members. For the first year, we received over \$14,000 per full-time equivalent member. This paid for one full-time field work coordinator for our four members.

Now we receive only \$12,400 for each full-time equivalent member, and we have had to raise our membership to 54 members just to get paid 75 percent of a field work coordinator. Our AmeriCorps grant pays 20 percent of my salary, but I spend 80 percent of my time on AmeriCorps. It takes just as much staff time to coordinate and handle the bureaucracy for ten quarter-time members as it does for ten full-time members.

Therefore, we are being penalized for having a corps that targets seniors serving quarter time. In fact, any program with members of any age is being penalized if its members are not full-time, the paperwork to run an AmeriCorps program is so onerous. I run an RSVP program of over 600 volunteers with less stress and staff than it takes to run a part-time AmeriCorps program of 50 members.

I request that the Corporation consider changing the rules to allow that a different formula be used to fund half-time and quarter-time programs, so that enough staff can be hired to run the program, that older adult members be allowed to waive or transfer their Ed. awards or be able to use the money for other things such as Medicare supplemental insurance. This would free up some of the money put into Ed. awards for perhaps other uses.

I recommend that older adult members be allowed to continue to reenlist after their two terms without an Ed. award. It seems inconsistent that the Corporation asked us to start a senior AmeriCorps with the objective of diversifying the corps and bringing in members who can be an example to younger people just starting a lifetime of service, and then kick them out after they have proven themselves to be teachers, mentors, and leaders of other AmeriCorps members and community volunteers.

I also suggest you eliminate the need to raise 15 percent cash match to member stipends for the local community. In-kind donations of supplies, training, office space, uniforms, and recognition are relatively easy to obtain. However, cash to pay for volunteer stipends is almost unheard of.

I also request that the Corporation drop from consideration the possibility of raising the 30 percent local match each year. The non-profit organizations that fund us are being strapped, and they are being made demands from all corners, and I'm afraid that my program will be dropped if we go above the 30 percent local match. Thank you.

MS. VAN der VEER: Thank you. Go ahead, Kevin.

MR. BURKE: Hi. My name is Kevin Burke. I'm a former AmeriCorps member, the AmeriCorps Peacekeepers Program in New Jersey. I then went on to direct that

program, and now I'm a staff member at Youth Build USA, and we've got an AmeriCorps program there.

I was at a meeting yesterday, and one of my coworkers said the words, in talking about our Youth Build AmeriCorps members, that the moment you begin to improve yourself, you begin to improve your community. Dorothy spoke about the population of our AmeriCorps members. So many of them are looked at or have been looked at as service recipients and not as service providers, and as AmeriCorps, we need to foster that ethic of service within them.

So one of my proposals is that we increase what we call training time now to 30 percent or 40 percent, not a requirement but allowing programs to focus more on member development, and part of that goes to the volunteer generation. We believe that our AmeriCorps members should be able to recruit volunteers to provide member development services for them.

This 40 percent that I'm talking about doesn't necessarily need to be training hours. I also think they should call it something other than that like maybe indirect service hours, so that folks can use that to do their capacity-building or their fund-raising because my assumption or I believe that once this is going to Congress, there's going to be a question that comes back that says, you know, well, aren't AmeriCorps VISTAs doing that? Isn't that what they're supposed to be doing? So I think if we build in a higher percentage of training time or indirect service time, they'll be able to use that for their capacity-building.

So again, speaking about the economically disadvantaged members which many of our programs serve, I don't believe that they're being served properly, I guess you can say. We've talked about service, and when we hear about service, it always seems like service for middle class, service for college-age students, service for those who can afford to serve.

We have members that are taking their time, who may not be ready for college once they leave our program, so I have another proposal which also says that low-income students or any AmeriCorps member can use the education award not only for Title 4 education schools, but they can also use them for vocational programs, for technical schools that have been approved by other government agencies, whether it's the Department of Labor, Department of Education, JTPA, and other programs. With that, thank you.

MS. VAN der VEER: Kevin, thank you, and also Mary, for those very thoughtful comments. Rosie, do you have anything for this panel?

MS. MAUK: Yes. I just want to say, Mary, you talk a lot about some things that would just deeply impact your program that you know, and so in any written testimony, if you have some ideas of ways that perhaps we -- I mean, what we will struggle with in doing our rulemaking is identifying those that have the capacity to do some things and those that don't, so we're trying to identify how do we talk about intermediaries and how do we define high poverty areas and rural areas, so any advice that you can give us in some of your written testimony would be very helpful.

I also just want to say that of all the things that you listed that we will certainly think about and consider so carefully. The one piece on the transferability of the ed. award,

you know, we would have to wait for re-authorization to do, and we won't -- that's not something we would be able to do in rulemaking.

Same thing to you, Kevin. Thank you so much certainly for your service that you did do as a member and what you do now for your program, and any more thoughts and ideas that you can give us in writing would just be so deeply appreciated.

MS. VAN der VEER: It's almost 1:00. Three hours is a long time to sit in a federal building, and I want to thank you all for coming, for listening. For those of you who made statements here today, thank you for your thoughtfulness, thank you for caring enough about AmeriCorps and the Corporation for National and Community Service, and this whole business of national community service.

For your continued involvement in this process, I want to spend some time now just telling you how you can do that. Did everyone receive one of these when they came in, the little blue flyer? Okay. You see a banner there. That's how you can e-mail us. If you have additional thoughts, for those of you who gave testimony here today, if you have additional thoughts and would like to elaborate, e-mail us. If you didn't speak today and have some thoughts that came out of this, e-mail us.

If, however, you would like to type something and fax it to us, the fax number is here on this piece of paper. If you would like to state something for the record in one of our conference calls, we've got two more conference calls, April 1 from 3:00 to 5:00 eastern time and April 5 from 1:00 to 3:00 eastern time. You can RSVP to be a participant in one of those conference calls, and if you're so inclined to fly to Dallas or to come to Washington, D.C., we're having two more of these meetings.

We'll be in Washington next Wednesday. I know we'll see a number of the E.D.s there because the E.D.s, the executive directors of the state commissions, will be in Washington next week. Then we also will be in Dallas next Friday, a week from today. So again, this is the informal iterative process part. If you want to get engaged, now is the time to do it. It doesn't mean you can't in the later part, but as David mentioned, that's the more formal part, so it will be more difficult for us to e-mail back and forth.

I know that we do want to get the best ideas. Those ideas build upon each other, and we expect that through this rulemaking as we've gone through it in March, new and different ideas will emerge as people listen to one another and as we ask questions and you ask questions back to us. So again, we appreciate your time. Rosie, is there any final thing you'd like to say?

MS. MAUK: No. David always closes these sessions, and I know how he was most upset he had to leave early and hope that he wasn't sending any kind of message that he wasn't listening. It's all we talk about these days at the Corporation, and what we talk about are the ideas that you all are giving us and how we do this. So thank you for participating, thank you for your time, and let's just keep working together on this. Thank you.

MS. VAN der VEER: Again, thank you to the Massachusetts Service Alliance and to Mal Coles and the staff at the Massachusetts State Office for their help in convening and putting this meeting together. Thank you all.

- - -

(The meeting concluded at 1:00 p.m.)

- - -